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October 31, 2002

VIA OVERNIGHT DELIVERY

Gwendolyn Massenburg
Regional Project Manager
U.S. EPA Region V
77 West Jackson Blvd.
Chicago, IL 60604

**Re: Chemical Recovery Systems, Inc. (CRS) Site
Parsons' Quality Management Plan (QMP) Revision #1**

Dear Ms. Massenburg:

On behalf of the CRS Site Group, Respondents to the Administrative Order on Consent (AOC) for the Chemical Recovery Systems, Inc. (CRS) Site in Elyria, Ohio, I submit the following revised plan for your review and approval:

1. Parson's Quality Management Plan, Revision #1.

Pursuant to AOC ¶ 63, this plan was originally submitted within thirty (30) days of the effective date of the AOC (June 27, 2002). On or about October 2, 2002, the CRS Site Group received a Notice of Deficiency to the Site Contractor Qualifications and Quality Management Plans via electronic mail, containing the following itemized deficiency:

The QMP submitted by Parsons is deficient because it does not follow the requirements of the AOC Section VIII, Work To Be Performed, Paragraph 63, that: "The QMP should be prepared in accordance with "EPA Requirements for Quality Management Plans (QA/R-2)" (EPA/240/B-01/002, March 2001).

U.S. EPA's reviewer also provided detailed comments in an attachment to the Notice. The QMP for Severn Trent Laboratories was approved in the same Notice.

The Revised QMP is being submitted within thirty (30) days of receiving U.S. EPA comments as requested in the Notice. We also note for the record that Paragraph 63 does not include an obligation to

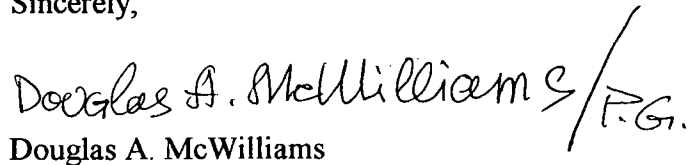
Gwendolyn Massenburg
October 31, 2002
Page 2

"amend and submit to the U.S. EPA a revised QMP within thirty days of receiving U.S. EPA comments." Cf. Notice, ¶ 3. We, nonetheless, appreciate this opportunity to work with you to correct and re-submit the QMP before receiving a formal disapproval.

In accordance with the clarification recently received from Associate Regional Counsel, Tom Nash, we are submitting three (3) copies of the QMP to you as Regional Project Manager and one copy to Ohio EPA's Northwest District Office (attention Larry Antonelli) in full satisfaction of our obligations under the AOC and the Statement of Work for the CRS Site.

Please contact me if you have any clarifying questions regarding the QMP or if you would like to discuss any aspect of this plan.

Sincerely,

/F.G.
Douglas A. McWilliams

Enclosure

Copy: Lawrence Antonelli, Ohio EPA
Jeff Sussman
CRS Site Group